# EXHIBIT 66

Case 1:19-cv-01853-SAG Document 86-2 Filed 08/06/21 Page 2 of 6 **BRIAN E. FROSH** 

**ELIZABETH F. HARRIS** Chief Deputy Attorney General

> **CAROLYN QUATTROCKI** Deputy Attorney General

# STATE OF MARYLAND OFFICE OF THE ATTORNEY GENERAL

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Attorney General

WRITER'S DIRECT DIAL NO. (410) 576-7043 jfine@oag.state.md.us

July 26, 2021

Sent via email

Paul D. Schmitt, Esquire Alliance Defending Freedom 440 First Street NW, Suite 600 Washington, D.C. 20001 PSchmitt@ADFlegal.org

> Re: Bethel Ministries, Inc. v. Choudhury, 1:19-cv-1853-SAG (D. Md.);

Supplemental Document Production

Mr. Schmitt:

While preparing the defendants' opposition and reply memorandum for the parties' cross-motions for summary judgment, we discovered that a small number of emails responsive to the plaintiff's requests for production of documents were inadvertently left out of the defendants' production. We are providing those emails to you now. documents are bates stamped BETHEL DEFENDANTS 4841 to 4850.

These emails were accidentally omitted from the defendants' production. We apologize for the oversight.

Very truly yours,

/s/ Justin E. Fine

cc: All counsel of record

#### 

**From:** Claire Dant <claire.dant@teambethel.org>

**To:** Jamie Klarman < james.klarman@maryland.gov>

**Subject:** Re: Handbook review information **Date:** Thu, 22 Feb 2018 13:54:08 -0500

**Importance:** Normal

Inline-Images: changingMD.png

### Mr. Klarman,

Thanks for forwarding me the guidelines being used to evaluate the handbook language of schools who have applied for non-public textbook funding. I was still hoping to hear from you regarding what the issue was regarding OUR language. In looking at the categories listed, we clearly don't fall into either category 1 or 2 because we don't "reserve the right to refuse admissions..." based on anything related to a person's sexual orientation or sexual conduct.

That would put us in category 3 as we don't mention sexual orientation at all in our admission requirements. We use a general nondiscrimination statement that is what is required by the IRS for our tax-exempt status, and we mention conduct/behaviors that a student must adhere to (implying that he/she CAN be admitted). In addition, we HAVE signed the assurance that we do not discriminate in admissions.

Please clarify what it is, then, that resulted in our receiving a letter of non-approval.

Thanks for your understanding and assistance,

Claire Dant Principal, Bethel Christian Academy

On Wed, Feb 21, 2018 at 1:33 PM, Jamie Klarman < <u>james.klarman@maryland.gov</u>> wrote:



Jamie Klarman

Nonpublic Schools Program Coordinator

Maryland State Dept. of Education

Division of Business Services

200 W. Baltimore Street

Baltimore, Maryland 21201

james.klarman@maryland.gov 410-767-0141 (office)

<u>Click here</u> to complete a three question customer experience survey

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Claire M. Dant Principal, Bethel Christian Academy

"The only thing that counts is faith expressing itself through love." Galatians 5:6

## 

**From:** Claire Dant <claire.dant@teambethel.org>

**To:** Jamie Klarman < james.klarman@maryland.gov>

Subject: Re: Notice concerning application status for Nonpublic Textbook and Technology

program

**Date:** Thu, 1 Mar 2018 10:43:00 -0500

**Importance:** Normal

Inline-Images: changingMD.png

#### Mr. Klarman,

You may recall that we spoke on February 21 about this notification that Bethel Christian Academy was not approved for Non-Public Textbook funding due to our polices.

At that time, you stated that our handbook had been looked at again that morning and that the people looking at it felt that a second opinion was required. You subsequently emailed me a copy of the guidelines that MSDE was given for the process of reviewing school policy documents.

I have heard back from you regarding the MSDE decision nor my request for the specific reason for our not being approved for this funding. Would you please email me both the final decision *and* the rationale for the denial?

Thank you in advance for your help with this matter. I look forward to hearing from you soon.

Sincerely,

Claire M. Dant Principal, Bethel Christian Academy

On Wed, Feb 14, 2018 at 2:39 PM, Jamie Klarman < james.klarman@maryland.gov > wrote:

| Please see attached letter.



Jamie Klarman

Nonpublic Schools Program Coordinator

Maryland State Dept. of Education

Division of Business Services

200 W. Baltimore Street

Baltimore, Maryland 21201

james.klarman@maryland.gov 410-767-0141 (office)

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Claire M. Dant Principal, Bethel Christian Academy

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